The Honorable Jamal Whitehead 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 DEANNA HUNTER, on behalf of ROY K. Civil Action No. 2:24-cv-00026-JNW 11 OLUND, an individual STIPULATED MOTION AND 12 Plaintiff, (PROPOSED) ORDER TO EXTEND 13 TIME TO RESPOND TO COMPLAINT VS. 14 WELLS FARGO BANK, N.A., 15 Defendant. 16 17 Plaintiff Deanna Hunter, on behalf of Roy K. Olund ("Plaintiff") and Defendant Wells 18 Fargo Bank, N.A. ("Defendant," and together with Plaintiff, the "Parties") jointly bring this 19 stipulated Motion to jointly request as follows: 20 WHEREAS, on or about December 7, 2023, Plaintiff filed a complaint in the Superior 21 Court of the State of Washington, County of King, Case No. 23-2-24242-4 (the "Action"); 22 WHEREAS, the summons and complaint were served on Defendant's agent for service 23 of process on December 8, 2023; 24 WHEREAS, Defendant filed a notice of removal of the Action to this Court on January 5, 25 2024, making Defendant's responsive pleading presently due by January 12, 2024 per Fed. R. 26 Civ. Proc. Rule 81; 07685.3143/16690492.2 FOX ROTHSCHILD LLP STIPULATED MOTION TO EXTEND TIME TO 1001 FOURTH AVENUE, SUITE 4400 RESPOND TO COMPLAINT SEATTLE, WA 98154 (CASE NO. 2:24-CV-00026-JNW)- 1 206.624.3600

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WHEREAS, the Parties, through counsel, have agreed to an extension of time for 1 Defendant to answer, move or otherwise respond to the Complaint through and including 2 February 9, 2024, for Defendant to complete its initial factual investigation; 3 WHEREFORE, Plaintiff and Defendant stipulate as follows, subject to Court approval: 4 5 1. The time for Defendant to answer, move or otherwise respond to the Complaint shall be through and including February 9, 2024; and 6 2. This extension will not affect any other deadlines in this case. 7 DATED: January 12, 2024 FOX ROTHSCHILD LLP 8 9 /s/Al Roundtree Al Roundtree, WSBA #54851 10 1001 Fourth Avenue, Suite 4500 Seattle, Washington 98154 11 Tel: 206.624.3600 12 Fax: 206.389.1708 Email: ARoundtree@FoxRothschild.com 13 Attornevs for Defendant WELLS FARGO BANK, N.A 14 DATED: January 12, 2024 BADGLEY MULLINS TURNER PLLC 15 16 By: /s/ Mark A. Trivett 17 Mark A. Trivett 9929 Ballinger Way NE, Ste. 200 18 Seattle, WA 98155 19 Tel.: 206-621-6566 Email: mtrivett@badgleymullins.com 20 Attorneys for Plaintiff Deanna Hunter on behalf of Roy K. Olund 21 22 23 24 25 26

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STIPULATED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT (CASE NO. 2:24-CV-00026-JNW)- 2 153689988.1

IT IS HEREBY ORDERED that the foregoing stipulated Motion is GRANTED.

Dated this 23rd day of January, 2024

Jamal N. Whitehead

United States District Judge

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